REMARKS/ARGUMENTS

Favorable reconsideration of this application as presently amended is respectfully requested.

Claims 22-34 and 49-54 are presently active, Claims 22 - 29 and 32 having been amended, Claims 49-54 having been added, Claims 21 and 35-48 having been canceled without prejudice by the present amendment, and Claims 1-20 having been canceled by a previous amendment.

In the outstanding Office Action, Claims 21-25, 28-29, and 35-39 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Frankel (U.S. Pat. No. 6,106,630). Claims 26-27, 41, and 43 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Frankel in view of Shinohara (U.S. Pat. No. 5,612,144). Claims 30-31 and 40 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Frankel in view of Shiozawa (Jap. Pat. No. 07240457). Claims 32-34 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Frankel in view of Shinji (Jap. Pat. No. 05198498). Claims 42 and 44-48 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Frankel in view of Shinohara and further in view of Shiozawa.

Firstly, Applicants acknowledge with appreciation the courtesy of Examiner Kackar to interview this case on July 24, 2003. During the interview, new Claim 49 presented herewith was discussed. In particular, the feature of a single-substrate-processing apparatus having an insulating pedestal and the feature of a conductive film integrally formed on a surface of the ceramic heater and on a surface of the insulating pedestal, and electrically connected at a

lower end of the pedestal to a grounded portion were discussed. Applicants' representative pointed out that in Frankel the worktable (depicted therein as element 12) is made of aluminum or an aluminum alloy.[1] While the material of the pedestal (i.e., shaft 100) is not clearly described, it must be the same as or similar to that of the worktable, since the pedestal is welded to the worktable.[2] Hence, there is no disclosure or suggestion in Frankel for an insulating pedestal. Further, Applicants' representative pointed out that Frankel only discloses a conductive film (i.e., protective layer 500) formed only on the worktable and not on the pedestal. With the pedestal in Frankel being made of a conductive material, one of ordinary skill in the art would not be motivated to apply a conductive film to the conductive pedestal. While no agreement on patentability was reached, Examiner Kackar indicated that motivation for adding a conductive film to the pedestal of Frankel was not strong.

Accordingly, new independent Claim 49 presented herewith defines a single-substrate-processing apparatus for performing a semiconductor process. The apparatus includes an insulating pedestal connected to a worktable to support the worktable. The apparatus includes a conductive film integrally formed on a surface of the ceramic heater and on a surface of the pedestal, and electrically connected at a lower end of the pedestal to a

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[1]Frankel, column 8, lines 41-44.

[2]Id., column 10, lines 10-14.

grounded portion, which is disposed as a part of the process chamber or disposed outside the process chamber.

Accordingly, when viewing the structures of Claim 49 and the structure cited in the applied art references in terms of an arrangement for countermeasures against static electricity, the structure of Claim 49 differs from those of for example Frankel and Shinohara, and thus cannot be viewed obvious in view of these or the other applied art references.

For example, in Frankel, the electrical conduction path to ground is ***through the bodies*** of the element 12 (i.e., a worktable) and element 100 (i.e., a pedestal). This concept of releasing electric charges to pass through the body of a structure brings about a limitation in Frankel that the worktable and pedestal have to themselves both be conductive. Similarly, Shinohara discloses a conduction route in which electric charges flow through a conductive ceramic layer 8 and then through the metal substrate 2 of a vacuum chuck 1 to ground. In both cases, the conductive route formed is not along the surface of the structure, but rather is formed in the body of the structure.

M.P.E.P. §2143 requires for *prima facie* obviousness that both the teaching or suggestion to make the claimed combination be found in the prior art and not in Applicants' disclosure. With no disclosure in the applied art references for a conductive film integrally formed on a surface of an insulating pedestal, and accordingly with no disclosure or suggestion in Frankel to apply a conductive film to a surface of an insulating pedestal, the requirements for *prima facie* obviousness set forth in M.P.E.P. §2143 have not been met. Only impermissible hindsight gained from Applicants' disclosure would motivate one to

utilize an insulating pedestal and to apply a conductive film to the surface of the insulating pedestal, as defined in independent Claim 49.

Thus, it is respectfully submitted that independent Claim 49 and the claims dependent therefrom patentably define over the applied prior art.

Consequently, in view of the present amendment and in light of the above discussions, the outstanding grounds of rejection are believed to have been overcome. The application as amended herewith is believed to be in a condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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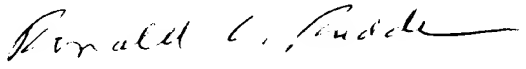

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